

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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REGAL WARE, INC.,	:	
	:	
Appellant,	:	
	:	
v.	:	Case No. TBD
	:	
SEB S.A., <u>et al.</u> ,	:	
	:	
Appellees.	:	
	:	
- - - - -	X	
In re:	:	
	:	Chapter 11
GLOBAL HOME PRODUCTS LLC,	:	
<u>et al.</u> ,	:	Case No. 06-10340 (KG)
	:	Jointly Administered
Debtors.	:	
- - - - -	X	

**DESIGNATION OF SEB S.A., GROUPE SEB USA,  
AND WACHOVIA BANK, NATIONAL ASSOCIATION, AS AGENT,  
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

SEB S.A. and Groupe SEB USA (collectively, the "Purchaser"), the purchasers of certain assets of the debtors and debtors-in-possession in the above-captioned chapter 11 cases, and Wachovia Bank, National Association, as Agent (the "Agent"), by their undersigned attorneys and pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), hereby designate the following items to be included in the record on appeal, in

addition to the items previously designated by the appellants or other appellees:

1. Notice of Supplement to Motion and Supplement to Motion of the Debtors for an Order  
(I) (A) Approving Sale Procedures and Overbid Protections in Connection with Sale of Substantially All of the Operating Assets Owned by the WearEver Debtors; (B) Scheduling an Auction and Hearing to Consider Approval of the Sale; (C) Approving Notice of Respective Dates, Times and Places for Auction and for Hearing on Approval of (i) Sale and (ii) Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (D) Approving Forms of Notice; (II) Approving Inventory Advance Provisions and Granting Security Interests and Superpriority Claim; and (III) Granting Related Relief [Docket No. 525].
2. Certification of Counsel Regarding Revised Proposed WearEver Sale Procedures Order [Docket No. 545].
3. Debtor's Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) and Demand for Production of Documents Pursuant to Rule 34 of the Federal Rules of Civil Procedure [Docket No. 628].
4. Certification of Counsel Regarding Revised Proposed WearEver Sale Order [Docket No. 659].
5. Regal Ware, Inc.'s Motion for Emergency Hearing [District Court Docket No. 4].<sup>1</sup>

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<sup>1</sup> References to "District Court Docket No. \_\_" refer to the docket of Regal Ware, Inc. v. SEB S.A., et al., Case No. 1:06-cv-00508 (JJF) (D. Del.), the proceedings before the United States District Court for the District of Delaware on Regal Ware, Inc.'s motion for stay of the sale order pending appeal.

6. Debtors' Opposition to Emergency Motion of Regal Ware, Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 6].
7. Memorandum of Purchasers in Opposition to Emergency Motion of Regal Ware, Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 7].
8. Objection and Memorandum of Wachovia Bank, National Association in Opposition to:
  - (1) Motion for Emergency Hearing and
  - (2) Emergency Motion of Regal Ware, Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 8].
9. Appendix to Debtors' Opposition to Emergency Motion of Regal Ware, Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver

Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 9].

10. Appendices of Unreported Decisions in Connection with the Debtors' Opposition to Emergency Motion of Regal Ware, Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 10].
11. Joinder of the Official Committee of Unsecured Creditors to Opposition of the Debtors to Emergency Motion of Regal Ware Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 12].
12. Supplement to Debtors' Opposition to Emergency Motion of Regal Ware Inc. for Stay Pending Appeal of Order Approving Motion of the Debtors for an Order: (I) Approving Sale by the WearEver Debtors of Substantially All of the WearEver Debtors' Operating Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Sections 363(b), (f) and (m) of the

Bankruptcy Code, (II) Assuming and Assigning Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [District Court Docket No. 13].

13. Memorandum Order [District Court Docket No. 14].
14. Transcript of Auction Beginning at 10:00 a.m. on Monday, August 7, 2006, introduced as an exhibit at the August 8, 2006 hearing.
15. Transcript from August 7, 2006 hearing [Docket No. TBD], a copy of which has been ordered from the transcriber and will be provided to the Court upon receipt.
16. Transcript from August 11, 2006 hearing [Docket No. TBD], a copy of which has been ordered from the transcriber and will be provided to the Court upon receipt.

#### **RESERVATION OF RIGHTS**

The Purchaser and the Agent expressly reserve their rights to object in the United States District Court for the District of Delaware or otherwise move to strike or modify some or all of the Statement of Issues and Designation of Record by Appellant Regal Ware, Inc. (Docket No. 755) (the "Appellant Designation"), including (without limitation) on the basis that the appellant filed the Appellant Designation in an untimely manner or otherwise not in compliance with Bankruptcy Rule 8006.

Dated: Wilmington, Delaware  
September 18, 2006




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